

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
)	No. 2:19-cr-00013
v.)	Chief Judge Crenshaw
)	
GEORGIANNA A.M. GIAMPIETRO)	

UNITED STATES' SEPARATELY PROPOSED JURY INSTRUCTIONS

The United States of America, by and through its attorneys, the United States Attorney for the Middle District of Tennessee and the Chief of the Counterterrorism Section of the National Security Division, United States Department of Justice, hereby files the Government's Separately Proposed Jury Instructions, attached hereto as Exhibit A, regarding those specific instructions upon which the parties could not agree after extensive consultation.

The Government specifically objects to any instructions submitted as part of the defendant's separately filed jury instructions.

Moreover, the Government specifically objects to defense counsel's separately submitted jury instructions (and verdict form) for Counts One and Two as the Government does not believe unanimity as to the means by which the defendant committed Counts One and Two is necessary. Attached hereto as Exhibit B, the Government is submitting a memorandum in support of its position on Counts One and Two.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 26, 2021, I electronically filed one copy of the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a Notice of Electronic Filing to counsel for all defendants in this case.

/s/ Kathryn D. Risinger
KATHRYN D. RISINGER
Deputy Criminal Chief